

THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:	§	
	§	
KIMBERLY D MCROBERTS	§	CASE NO. 19-40065-R
XXX-XX-5767	§	
2772 CLUB RIDGE DRIVE	§	CHAPTER 13
LEWISVILLE, TX 75067	§	
	§	
DEBTOR	§	

TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN AFTER
CONFIRMATION

TO THE HONORABLE JUDGE OF THE UNITED STATES BANKRUPTCY COURT :

COMES NOW CAREY D. EBERT, the Standing Chapter 13 Trustee, and files this Objection to Debtor's Motion to Modify Chapter 13 Plan After Confirmation in the above styled case, and for cause would show the Court the following:

The Trustee objects to the Debtor's Motion to Modify Chapter 13 Plan After Confirmation on the following grounds:

Debtor must seek Court approval by motion for retention of full tax return amount.

WHEREFORE, PREMISES CONSIDERED, Carey D. Ebert, The Standing Chapter 13 Trustee, prays that the Court set a hearing on the matter and enter an order denying the Debtor's Motion to Modify Chapter 13 Plan After Confirmation and providing such other relief as is just and equitable.

Respectfully submitted,

/s/ H. Jefferson LeForce
Carey D. Ebert, Chapter 13 Trustee, TBN 05332500
H. Jefferson LeForce, TBN 00791094
Office of the Standing Chapter 13 Trustee
500 North Central Expressway, Suite 350
Plano, Texas 75074
(972) 943-2580 / Fax (972) 943-8050

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Objection to Debtor's Motion to Modify Chapter 13 Plan After Confirmation has been served upon the following parties in interest on the date set forth below by mailing a copy of same to them via first class mail.

KIMBERLY D MCROBERTS
2772 CLUB RIDGE DRIVE
LEWISVILLE, TX 75067

COLLINS & ARNOVE
555 REPUBLIC DR.
SUITE 200
PLANO, TX 75074-5469

PRA RECEIVABLES MANAGEMENT LLC
PO BOX 41021
NORFOLK, VA 23541

COLLINS & ARNOVE
555 REPUBLIC DR.
SUITE 200
PLANO, TX 75074

Dated: May 30, 2019

/s/ H. Jefferson LeForce

Office of the Standing Chapter 13 Trustee